

- - - - - X
UNITED STATES OF AMERICA
- v. -
LOUIS BRAVO,
Defendant.
- - - - - X

- V. -

Defendant.

18 Cr.

18 CRIM 283

The Grand Jury charges:

1. From at least in or about November 2012 up to and including at least in or about July 2017, in the Southern District of New York and elsewhere, LOUIS BRAVO, the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining property by means of false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice, and attempting to do so, did place in a post office and authorized depository for mail matter, matters and things to be sent and delivered by the Postal Service, and did deposit and cause to be deposited matters and things to be sent and delivered by private and commercial interstate carriers, and did take and receive therefrom, such matters and things, and did cause to be delivered by mail and such carriers, according to the directions thereon, and at the places at which they were

directed to be delivered by the person to whom they were addressed, such matters and things, to wit, BRAVO induced victims to send check payments by interstate mail for advertising and other media-related services that were never provided by falsely claiming to be a media company that represented various businesses and individuals, and BRAVO further caused those checks to be forwarded to another address by interstate mail.

(Title 18, United States Code, Sections 1341 and 2.)

COUNT TWO
(Wire Fraud)

The Grand Jury further charges:

2. From at least in or about November 2012 up to and including at least in or about July 2017, in the Southern District of New York and elsewhere, LOUIS BRAVO, the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, and attempting to do so, did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, to wit, BRAVO obtained check payments from victims for advertising and other media-related services that were never provided by falsely claiming to

be a media company that represented various businesses and individuals, and in connection therewith and in furtherance thereof, BRAVO transmitted and caused to be transmitted interstate electronic mail, telephone calls, and wire transfers of funds.

(Title 18, United States Code, Sections 1343 and 2.)

COUNT THREE
(Bank Fraud)

The Grand Jury further charges:

3. From at least in or about November 2012 up to and including at least in or about July 2017, in the Southern District of New York and elsewhere, LOUIS BRAVO, the defendant, willfully and knowingly, did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, BRAVO obtained check payments from victims with accounts at federally insured banks in exchange for advertising and other media-related services that were never provided by falsely claiming to be a media company that represented various businesses and individuals.

(Title 18, United States Code, Sections 1344 and 2.)

FORFEITURE ALLEGATION

6. As a result of committing the offenses alleged in Counts One and Two of this Indictment, LOUIS BRAVO, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses that the defendant personally obtained.

7. As a result of committing the offense alleged in Count Three of this Indictment, LOUIS BRAVO, the defendant, shall forfeit to the United States, pursuant to Title 18, Section 982(a)(2)(A), any and all property constituting or derived from, proceeds obtained directly or indirectly, as a result of the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense that the defendant personally obtained.

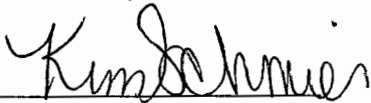
Substitute Assets Provision

8. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981, 982;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



FOREPERSON



GEOFFREY S. BERMAN
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

LOUIS BRAVO,

Defendant.

INDICTMENT

18 Cr.

(18 U.S.C. §§ 1341, 1343, 1344, and 2.)

GEOFFREY S. BERMAN

United States Attorney

Kim Schmitz
Foreperson

Truebill, Indictment, arrest warrants
Mag. RW Lehrburger
4/11/18 *RL*